

**PUBLIC LAW 104-191—AUG. 21, 1996 110 STAT. 1939**

Subtitle **F—Organizations Subject to Section 833**

Sec. 351. Organizations subject to section 833.

Subtitle **G—IRA Distributions to the Unemployed**

Sec. 361. Distributions from certain plans may be used without additional tax to pay financially devastating medical expenses.

Subtitle **H—Organ and Tissue Donation Information Included With Income Tax Refund Payments**

Sec. 371. Organ and tissue donation information included with income tax refund payments.

**TITLE IV—APPLICATION AND ENFORCEMENT OF GROUP HEALTH PLAN REQUIREMENTS**

Subtitle **A—Application and Enforcement of Group Health Plan Requirements**

Sec. 401. Group health plan portability, access, and renewability requirements.

Sec. 402. Penalty on failure to meet certain group health plan requirements.

Subtitle **B—Clarification of Certain Continuation Coverage Requirements**

Sec. 421. COBRA clarifications.

**TITLE V—REVENUE OFFSETS**

Sec. 500. Amendment of 1986 Code.

Subtitle **A—Company-Owned Life Insurance**

Sec. 501. Denial of deduction for interest on loans with respect to company-owned life insurance.

Subtitle **B—Treatment of Individuals Who Lose United States Citizenship**

Sec. 511. Revision of income, estate, and gift taxes on individuals who lose United States citizenship.

Sec. 512. Information on individuals losing United States citizenship.

Sec. 513. Report on tax compliance by United States citizens and residents living abroad.

Subtitle **C—Repeal of Financial Institution Transition Rule to Interest Allocation Rules**

Sec. 521. Repeal of financial institution transition rule to interest allocation rules.

**TITLE I—HEALTH CARE ACCESS, PORTABILITY, AND RENEWABILITY**

**Subtitle A—Group Market Rules**

**PART 1—PORTABILITY, ACCESS, AND RENEWABILITY REQUIREMENTS**

**SEC. 101. THROUGH THE EMPLOYEE RETIREMENT INCOME SECURITY ACT OF 1974.**

(a) IN GENERAL.—Subtitle B of title I of the Employee Retirement Income Security Act of 1974 is amended by adding at the end the following new part:

"PART **7—GROUP HEALTH PLAN PORTABILITY, ACCESS, AND RENEWABILITY REQUIREMENTS**

**SEC. 701. INCREASED PORTABILITY THROUGH LIMITATION ON PREEXISTING CONDITION EXCLUSIONS.**

"(a) LIMITATION ON PREEXISTING CONDITION EXCLUSION PERIOD:  
CREDITING FOR PERIODS OF PREVIOUS COVERAGE.—  
Subject to sub-section (d), a group health plan, and a health

insurance issuer